IN THE UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF TENNESSEE
NASHVILLE, TENNESSEE

WORD MUSIC, LLC., a Tennessee Limited Liability company, DAYSPRING MUSIC, LLC, a Tennessee Limited Liability Company, WORDSPRING MUSIC, LLC., a Tennessee Limited Liability company, UNICHAPPELL MUSIC, INC., a Delaware corporation, CHAPPELL & CO., INC., a Delaware corporation, COTILLION MUSIC, INC., a Delaware Corporation, RIGHTSONG MUSIC, INC., a Delaware Corporation, WALDEN MUSIC, INC., a New York Corporation, WARNER/TAMERLANE PUBLISHING CORP., a California corporation, and WB MUSIC CORP., a California corporation,

Plaintiff,

vs.-

PRIDDIS MUSIC, INC., a Nevada corporation, RICHARD L. PRIDDIS, individually, PROSOUND KARAOKE LTD., a United Kingdom corporation, MEDIOSTREAM, INC., a California corporation, d/b/a "K SUPERSTAR," D.J. MILLER MUSIC DISTRIBUTORS, INC., a Colorado corporation, d/b/a "PROSING," and DALE S. MILLER, Individually

Defendants.

Case No. 3:07-cv-502

JURY DEMAND

Judge Haynes

DECLARATION OF PAUL HARRISON STACEY

I, PAUL HARRISON STACEY, do hereby state:

1. My name is Paul Harrison Stacey and I reside at 7225 N. Spring Gulch Road, Jackson, Wyoming, 83001.

2. I am lead counsel for the Plaintiffs in the above-captioned copyright infringement matter and sent the initial cease and desist letter to the Defendants on or about January 26, 2007

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(A true and correct copy of my cease and desist letter is attached hereto, marked Exhibit "A", and is hereby incorporated and made a part hereof).

3. I received a number of oral and written communications from the various Defendants indicating that they were complying with the cease and desist and in some instances were going out of the karaoke business altogether. Two examples are the facsimile items of correspondence from PRIDDIS MUSIC and RICHARD L. PRIDDIS, which are attached hereto, marked Group Exhibit "B". In these memos, PRIDDIS indicated he was going to "...exit the Karaoke business."

4. Notwithstanding the Defendants' representations that they were honoring the cease and desist, I continued to attempt to monitor their business activities. In March and April, 2007, I learned that the PRIDDIS Defendants and the MILLER Defendants (DJ MILLER MUSIC DISTRIBUTORS, INC., and DALE S. MILLER, individually) were still distributing, advertising and selling infringing recordings of the Plaintiffs' music copyrights. During this timeframe, Dorothy Gibbey, a paralegal at Bowen, Riley, Warnock & Jacobson, was directed by me to attempt to purchase copies of the infringing recordings manufactured by PRIDDIS and PROSOUND via the PRIDDIS and PROSING interactive, internet websites. Her successful purchases of infringing recordings are detailed in the **DECLARATION OF DOROTHY D. GIBBEY**, which is filed concurrently herewith.

5. When confronted with the continuing infringement by the PRIDDIS, PROSOUND and MILLER Defendants, I had not choice but to prepare to file suit. When I inquired of the attorney for MEDIOSTREAM (Frear Steven Schmid, San Francisco, California), whether he was authorized to accept service on behalf of MEDIOSTREAM, I was told that he would have to check with his client. Within a few days, I was informed that MEDIOSTREAM

had filed its purported action for a declaratory judgment in the United States District Court for the Northern District of California. The MEDIOSTREAM case bears a filing date of April 17, 2007. (A true and correct copy of the MEDIOSTREAM Complaint for Declaratory Relief and Indemnification is attached hereto, marked Exhibit "C," and is hereby incorporated and made a part hereof.

6. The MEDIOSTREAM case named WARNER/CHAPPELL MUSIC, INC. as the entity from whom MEDIOSTREAM anticipated a suit for copyright infringement. In fact, WARNER/CHAPPELL MUSIC, INC., does not own or administer any of the copyrights which are the subject of this litigation and was not a proper Defendant in the San Francisco case and is not a proper Plaintiff (thus, is not named herein) in this case.

7. I instituted this copyright infringement case on May 8, 2007, which is brought by the ten (10) different music publishing entities which own/administer the 345 music copyrights infringed by the Defendants. This suit also names, in addition to MEDIOSTREAM and PRIDDIS MUSIC, INC., RICHARD L. PRIDDIS, individually, PROSOUND KARAOKE LIMITED, a U.K. Corporation, DJ MILLER MUSIC DISTRIBUTORS, INC., a Colorado Corporation, d/b/a "PROSING", and DALE S. MILLER, individually. These last four (4) Defendants are not parties to the MEDIOSTREAM case filed in the Northern District of California.

8. On May 14, 2007, MEDIOSTREAM filed its First Amended Complaint for Declaratory Relief in the Northern District of California, naming as additional Defendants all of the Plaintiffs in this case which had been filed on May 8, 2007, in the Middle District of Tennessee. The First Amended Complaint filed by MEDIOSTREAM does not include RICHARD L. PRIDDIS, individually, PROSOUND KARAOKE LIMITED, a U.K. Corporation,

DJ MILLER MUSIC DISTRIBUTORS, INC., a Colorado Corporation, d/b/a "PROSING", and DALE S. MILLER, individually, as parties. (A true and correct copy of the First Amended Complaint filed by MEDIOSTREAM in the Northern District of California, is attached hereto, marked Exhibit "D," and is hereby incorporated and made a part hereof.)

I declare under penalties of perjury that the foregoing is true and correct.

Executed this 14th day of June, 2007.

Paul Harrison Stacey